

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs in the cases listed on the attached Exhibits A-B and defendant American Medical Systems, Inc., (“AMS”) jointly move the court to dismiss AMS from these actions without prejudice and terminate them from the docket of the court, parties to bear their own costs. Other defendants remain in this action, and plaintiffs will continue to pursue this action against them.

Respectfully:

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Attorneys for Plaintiffs on Exhibit B

Dated: April 1, 2019

EXHIBIT A – WAGSTAFF & CARTMELL

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-cv-09318	Rhoda Gainey, Michael Gainey v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-cv-32110	Judith Radloff v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-15780	Eva Comardelle, Wilton P. Comardelle, Jr. v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:15-cv-04514	Grace English, David Alton English, Sr. v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:15-cv-07717	Crystal Beelen, David Beelen v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:17-cv-02939	Lucille Lafond v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – FLINT LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:17-cv-01615	Catherine Kaiser, Michael Kaiser v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis